

ATTACHMENT 2
SUPPORTING DOCUMENTATION FOR OU 2 RI REPORT EXTENSION REQUEST

- A. Good Causes: originally the OU 2 alluvial field work was to begin during December 1990. Actual field work did not begin until August 1991, a delay of 8 months.
1. Force Majeure - During the beginning of 1991, the United States initiated military actions in the Persian Gulf War (Desert Storm). Security precautions throughout the DOE Weapons Complex, including the Rocky Flats Plant, were significantly tightened, resulting in delaying field work. DOE began the Inspection and Evaluation (I&E) program to assess the security integrity throughout the Weapons Complex. Delays in the mobilization of drill rigs, the security clearing of subcontractor personnel, and delays in operational effectiveness resulted.
 2. A delay caused by another Party's failure to meet any requirement of the IAG.

Funding levels for Fiscal Year (FY) 1992 did not allow for implementation of the Phase II RFI/RI Bedrock Work Plan. ER requested approximately \$13 million to complete FY92 activities, but this funding level was reduced to \$7 million based on Congressional appropriations to DOE.

The Phase II RFI/RI Work Plan (Alluvial) was submitted during December 1989 and approved by EPA and CDH during April 1990. EPA and CDH required Technical Memorandum No. 1 be written to amend the original Phase II RFI/RI Alluvial Work Plan to include sections for the Environmental Evaluation, Quality Assurance Addendum, the conceptual model for the Human Health Risk Assessment and updating the geology section based on Sitewide Geologic Characterization Study. Technical Memorandum No. 1 was issued in Draft form in February 1991. During this time the Field Sampling Plan and the pump test concept were clarified. Technical Memorandum No. 1 was not approved in Final form by EPA and CDH until July 1991.

DOE/CDH/EPA required a future use residential scenario for the Human Health Risk Assessment. This required rewriting TM-5 Human Health Risk Assessment (HHRA)- Exposure Scenario, TM-6 HHRA - Model Description.

3. Any other event or series of events mutually agreed to by the Parties as constituting good cause.

Delaying of the Phase II RFI/RI Report allows DOE/RFO to analyze data collected during the Alluvial field program. This analysis and interpretation lends itself to a better technical approach to the Bedrock field program. Critical questions arising from the Alluvial program can be answered and resolved during the Bedrock program. EPA and CDH have informally approved the "Observational Approach" re-scoping of the Bedrock program. The better technical approach was only afforded by using data collected during the Alluvial field program.

Environmental Restoration (ER) document development time was longer than anticipated. Documents required by the IAG and approved by EPA and CDH included ER Standard Operating Procedures (SOP), the Quality Assurance Project Plan (QAPjP), Sitewide and OU specific Health and Safety Plans (H&SP), and the Environmental Management Radiological Guidelines (EMRG). These documents were not in place for the scheduled alluvial field work mobilization date contributing to the 8 month delay.

The DOE inclusion of the National Environmental Protection Act (NEPA) Categorical Exclusion (CX) into the permitting process also delayed the commencement of field work. This NEPA inclusion was based on DOE's guidance.

The Environmental Restoration Decontamination Pad was not operational until August 1991. This delay was a result of resolving RCRA Part B Permit requirements, disposal of wastes generated from operating the Decontamination Pad and complying with Health and Safety standards. Also, subcontractor yard preparation was delayed due to the Resumption efforts at the Rocky Flats Plant. Permanent power could not be quickly supplied to the subcontractor yard rendering the subcontractor field trailers and facilities inoperative. Delays were incurred while this matter was being resolved.

To comply with proper H&SP standards, a "B" Integrated Work Control Package (IWCP) was required versus use of ERM SOPs prior to performing field work. Preparation of the IWCP for OU 2 also created delays.

Subcontracted analytical laboratory capacity was exceeded causing delays in receiving validated data. The IAG schedule reflects 63 day lab turnaround time for unvalidated data and 21 days to validate the data. Actual average turnaround times for OU 2 validated data is 7 months, with some results exceeding an 11 month turnaround time.

The Human Health Risk Assessment for OU 2 requires collecting surficial soil samples. This type of sampling was not scoped during development of the Work Plan. EG&G submitted a Technical Memorandum (TM) to DOE/RFO in August 1992 to collect the samples. The Technical Memorandum was delayed by DOE/RFO in order to integrate sampling with the OU 2 Environmental Evaluation program. Since submittal of the original TM, these samples have become critical path for the Phase II RFI/RI Report. These data will be paramount in determining human risk from OU 2 and thereby necessitate an extension request.

The Historical Release Report changed and/or increased the boundaries of IHSSs in OU 2. Any additional sampling or drilling necessitated by these boundary changes may cause schedule delays.

- B. Any related timetable and deadline or schedule that would be affected if the extension were granted.

We are currently analyzing downstream milestone schedule impacts to OU 2. It is obvious that the milestone for the Final RFI/RI Report will be impacted. However, as discussed between EPA/CDH/DOE, we wish to focus on an extension for the Draft Report.